

DORSEY & WHITNEY LLP
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*Attorneys for Defendant
Banco de la Nación Argentina*

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----x
NML CAPITAL, LTD. and EM LTD.,

08 CV 7974 (TPG)

Plaintiffs,

- against -

THE REPUBLIC OF ARGENTINA and BANCO
DE LA NACION ARGENTINA,

Defendants.

-----x
NML CAPITAL, LTD.,

03 CV 8845 (TPG)

05 CV 2434 (TPG)

06 CV 6466 (TPG)

07 CV 1910 (TPG)

07 CV 2690 (TPG)

07 CV 6563 (TPG)

08 CV 2541 (TPG)

08 CV 3302 (TPG)

08 CV 6978 (TPG)

09 CV 1707 (TPG)

09 CV 1708 (TPG)

Plaintiff,

- against -

THE REPUBLIC OF ARGENTINA,

Defendant.

-----x
EM LTD.,

Plaintiff,

03 CV 2507 (TPG)

- against -

THE REPUBLIC OF ARGENTINA,

Defendant.

NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, the July 17, 2010 Second Supplemental Declaration of Juan Carlos Fábrega, and the exhibits annexed thereto, the July 28, 2010 Second Supplemental Declaration of Professor Geoffrey P. Miller, and

the exhibits annexed thereto, the July 27, 2010 Declaration of Hernan del Villar, and the exhibit annexed thereto, and the July 19, 2010 Second Declaration of Eduardo Barreira Delfino, Defendant Banco de la Nación Argentina (“BNA”) will move this Court before the Honorable Thomas P. Griesa, in the United States Courthouse for the Southern District of New York, 500 Pearl Street, New York, New York 10007, at a time and date determined to be acceptable by the Court, for an Order pursuant to Federal Rules of Civil Procedure 64 and 69, and Article 62 of the New York Civil Practice Law and Rules, vacating the *ex parte* attachment orders dated May 28, 2010, as well as such other relief as the Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that, pursuant to the agreement of the parties so ordered by the Court, Plaintiffs' opposing papers, if any, must be served on or before August 13, 2010, and Defendant BNA's reply papers, if any, must be served by hand delivery on or before August 30, 2010.

Dated: New York, New York
July 30, 2010

Respectfully submitted,

DORSEY & WHITNEY LLP

By: 

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